

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

IN THE MATTER OF THE SEARCH OF

Case No. 2:24mj1153 CMR

IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH
DISCORD ACCOUNTS IDENTIFIED IN
ATTACHMENT A

AFFIDAVIT IN SUPPORT OF
APPLICATION FOR SEARCH WARRANT

Judge [Select Judge](#)

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Jed Wright, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with certain accounts that are stored at premises owned, maintained, controlled, or operated by Discord, Inc. (hereafter Discord), an electronic communications service headquartered at 444 De Haro Street, Suite 200, San Francisco, California 94107. The information to be searched is described in the following paragraphs and in **Attachment A**. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Discord to disclose to the government records and

other information in its possession pertaining to the subscriber or customer associated with the accounts, including the contents of communications.

2. I am employed as a Special Agent with the Federal Bureau of Investigation (FBI), with authority to investigate federal offenses pursuant to Titles 18 and 21 of the United States Code. I have been employed as a Special Agent with the FBI since March 2019. Prior to Special Agent, I was employed as a Support Services Technician with the FBI from 2010 to 2011, Administrative Assistant with the FBI from 2011 to 2013, and Investigative Specialist with the FBI from 2013 to 2019. I have obtained a Bachelor of Arts Degree in Spanish Language and Literature, and a Bachelor of Arts Degree in International Studies from the University of Utah, Salt Lake City, Utah. I have also obtained a Special Functions Officer and Law Enforcement Officer Certifications from the Police Officer Standards and Training in Salt Lake City, Utah. I graduated from the FBI Academy in Quantico, Virginia in 2019 and have over four years of federal law enforcement experience.

3. I am currently assigned to the Provo Resident Agency of the Salt Lake City Division of the FBI. My duties involve investigating federal crimes involving child exploitation and child pornography. As part of my official duties, I have conducted and participated in investigations relating to the sexual exploitation of children. During these investigations, I have observed and reviewed examples of child pornography in various forms of media, including computer media. I have also received training and instruction in the field of investigating child pornography, executing search warrants, identification and collection of computer-related evidence, provide, assistance to foreign law enforcement agencies, search and seizure of computers, and analysis of electronically stored information for online accounts including pen

registers and trap and trace devices. In addition to my basic law enforcement training at the FBI Academy, I have also received training in the criminal use of email, social media, and telephonic communications, computer-related crime, and analyzing messaging, telephone, and electronic pen register and caller identification data.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18 U.S.C. § 2251(a) (Sexual Exploitation of Children/Production of Child Pornography), 18 U.S. Code § 2252A(a) (Distribution of Child Pornography), Title 18 U.S.C. § 2252A(a)(5) (Possession of Child Pornography) have been committed by TROY SULLENBERGER. There is also probable cause to search the information described in Attachment A for evidence, instrumentalities, contraband, and/or fruits of these crimes as further described in Attachment B.

JURISDICTION

6. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

PROBABLE CAUSE

1. On or about 08/04/2024, the Electronic Service Provider (ESP) Synchronoss Technologies, reported to the National Center for Missing and Exploited Children (NCMEC), via CyberTip #197304931, that a user had uploaded files containing depictions of minors engaging in sexually explicit conduct to his account. The ESP had already viewed these files (6 files) and Detective Lucas Harrison (Det. Harrison) and your Affiant viewed them as well and confirmed they were CSAM, such as:

a. File 1, Title: a48d379e53534844ae237043995f930b_9351fc518d3fce916116997b9b5b86abec4cb197c38e97673273e27238b7b657 MD5: 4821c8172e48173712650e41ca6ddef4

Description: This is a color video, 30 seconds in length. The video shows an unidentified adult male sodomizing (penis to anus) a prepubescent female approximately the age of 7-10. The female child is only shown exposing her vagina/labia, and the male's penis is going in and out of child's anus. The child's body is then shown and is small like a child. The child is laying on her back on a bed while the male is standing. The child is wearing pink pajamas and a white shirt.

b. File 2, Title: a48d379e53534844ae237043995f930b_1e8563cf2d8c93224ed25a138c3c6c178deb3e28aff45f1f0479621800b089c0 MD5: 8216f42dc4e93414e9720cb79139dc51

Description: This is a color video, 31 seconds in length. The video shows a prepubescent female child approximately 7-9 years old. The child is laying on her back wearing black lingerie and a black mask. The child's breasts and vagina are exposed. The adult male places his thumb in the child's mouth during the video. The unseen male is observed sodomizing (penis to anus) the child. The unseen male is heard groaning during the video.

c. File 3, Title: a48d379e53534844ae237043995f930b_8e8f495af2a428bf5389009cc68de79b18a74a2b0759151ff6d8cd7a918bf4ab MD5: ce8dc15c29b45edf9144a4aea88d8bb5

Description: This is a color video, 12 seconds in length. The video shows a prepubescent female being raped by an unseen male. The child is not wearing pants or underwear and is holding the unseen adult male's penis as he rapes her.

d. File 4, Title: a48d379e53534844ae237043995f930b_2162a15be48dc6db483d354c409c62463561103aa983c5157d8e6a8c6ffb0f8a MD5: d9321b82bfb54b3ec0b018098ac35349

Description: This is a color video 30 seconds in length. It shows a prepubescent female approximately 10-12 years old in age. The child is wearing a black bra with no other clothing. The child is sitting down with her legs spread making her vagina the focus of the video. The child begins masturbating and spreading her labia to expose her vagina further. The child then continues to masturbate.

e. File 5, Title: a48d379e53534844ae237043995f930b_cf0b2669057976ed5e795762c66097c12b02252fd099fe3658cb2a38845176b7 MD5: f3f4766a225cb4302388c48fd8bf09c5

Description: This is a color video, 41 seconds in length. It shows a prepubescent female approximately 9-11 years in age. The child is seen wearing a red t-shirt and pink underwear. The child is standing exposing her butt to the camera wearing the pink underwear, making her butt the focus of the video. The child is seen posing and moving her body in a sexually suggestive manner. The child then looks closely at the camera/phone as if to read something as if being directed what to do. The child then turns away from the camera and pulls her underwear off, exposing her naked buttock, then bending over to expose her vagina, and pulling on her buttock to further expose her anus. The child hits herself on the buttock, and pulls her labia to expose her vagina.

f. File 6 Title: a48d379e53534844ae237043995f930b_bcf064fc9b0b592da1883409f21a9157b52680848dfd5b3d851e407f12eaf7db MD5: f82e0b0dc585c4c36429bc1cfe1c984b

Description: This is a color video, 30 seconds in length. This is a point of view video from the view of the unseen adult male. The child is first seen on her knees wearing a black dress and shirt. The child is approximately 7-10 years in age. The child pulls down the male's pants exposing his erect penis. The child is then seen being sodomized (penis to mouth). There is a mirror behind the child in which you can see under her skirt, revealing her white underwear through a hole in her white stockings. The child's head is still seen moving during the video.

2. The CyberTip included information such as IP address, phone number, name of the suspect, and address of the suspect. The name was Troy Sullenberger (Troy) at his home address in Saratoga Springs UT. After a quick search of Troy's name using state databases, it was quickly learned that Troy was a registered sex offender and had previously been convicted for enticement of a minor.

3. A warrant was drafted and approved by a Utah state judge with the fourth district court for further content from Synchronoss Technologies. Synchronoss Technologies was served with the warrant and sent their return to Detective Det. Harrison. Det. Harrison and your Affiant reviewed the return and found further files of CSAM, many images of self-made CSAM using AI, and videos indicating the suspect, Troy, was sexually abusing a juvenile girl, later identified and who was 7 years old. Further warrants were drafted, approved, and served on Yahoo and Strata Networks (the ISP to whom the IP address is registered to). Strata Networks confirmed Troy Sullenberger as the registered owner of that IP address at his home address. Yahoo sent back a return that contained further AI CSAM and emails indicating Troy was interested sexually in underage (meaning under the age of 18) girls. Another ESP warrant was drafted and approved by a judge with the Fourth District Court for content from "friedhawk7428@yahoo.com." This

warrant was then served on Yahoo Inc. which returned an AI image of CSAM. Additionally, it showed a verification code for SoulGen. After a Google search of SoulGen, the first result is for soulgen.net. This is an AI tool to modify images, likely what Troy has been using to make AI CSAM. The title of this file is "001.551 _20240610_SoulGen_Verification_Code." There were additionally emails that stated the following, "A group of tik tok teen girls are flashing their entire naked bodies to men on omegle.com. They are covered in sweat, since they were fingering each other. Their bodies are petite and the opposite of matured, as they are underdeveloped and trembling with pleasure. They are the opposite of mature. They are the opposite of adults. mature, matured woman, big breasts, anything that isn't tiny breasts, dismemberment, meshed body parts, the opposite of children, bad bodies, genitals in the wrong parts of bodies."

3. A residential search warrant for Troy's home was drafted and approved by a Utah state judge with the fourth district court. This warrant was then served on the home on 09/05/2024. Troy was placed under arrest and interviewed. Troy admitted, after being advised of his Miranda Rights, of sending videos and images of him abusing the seven year old victim to another user using the application "Discord." Troy advised his username was "friedhawk7428" and the user he would send the images and videos to is "southpaw." This corroborated files found from Synchronoss Technologies of the screen shots from a video that Troy took of him abusing the victim that, as part of the title of the files, were name "screenshot" and "discord" in the titles. Further, there was screenshot of a conversation Troy had, and the username in the screenshot was "southpaw."

4. After conducting a forensic download of Troy's phone, additional information was gathered. It was learned that Troy's possible username for Discord is actually "friedhawk7428@yahoo.com." Additionally, there were videos found where Troy was looking

back on his conversation with "southpaw," scrolling through the messages, and clicking on the videos of both the CSAM where victims are not identified and the videos of Troy abusing the known victim in this case. In this same video that shows him scrolling and selecting videos, Troy will then show himself on his bed masturbating to these videos. These videos show that actual conversations were happening between Troy and "southpaw," they were exchanging CSAM using their Discord accounts, and that Troy was making these videos of the known victim in this case and making them for his own sexual desires.

7. Upon further review of content from Synchronoss Technologies, I observed screen shots taken while doing a webcam conversation. The following are dates and descriptions of the still shots.

- On 05/18/2024, the person who took the photo used atlolis or stickam and you can see parts of the breast, and genitals of an age difficult, approximately 13 to 15 year old female. There was another image of two girls holding the arms of a third girl up to the camera to expose her breasts to the other party. All three girls exposed their breasts. Another image showed a juvenile female exposing her breasts, and another in the background taking off her panties. The final image in this folder were two girls, that exposed their breasts, and one age difficult, prepubescent approximately 13 to 15 years old, fully naked, and gentiles exposed. All four images in the title stated "screenshot." The final image included a "play" button in the middle of the screen as if this was a full 1 hour, 25 minutes, 20-second-long video of these girls exposing themselves.
- On 05/15/2024, there was another webcam video that screenshots were taken on. The name of the girl in the video was "Sarah Bablee" or "Sarah Babiee," The images were a series of the female, taking off her bra and exposing her breasts. A child's breast exposed

is child erotica and based on my training and experience, individuals who are sexually attracted to children, seek out both child erotica and child pornography. There were three of these images. The other three images in this file seem to be more screen shots from the long video previously mentioned of juvenile females.

- On 12/08/2023, there were two more screen shots/still images from the video mentioned in the paragraph of age difficult nude juvenile females. The age difficult, approximately 13 to 15 year old females' genitals are exposed. File names 20231208_154034 and _154109.
- The final image of CSAM was in file 08/22/2023. The title of this image was 20211204_120659. It showed a male or female child, approximate age of 4-5 exposing their chest/nipples, breasts, and not appearing to wear pants, although no genitals can be seen, based on my training and experience those who seek out child erotica will seek out child pornography. This image appears to have been taken in a bedroom or bathroom.

8. Based on the further reviewed content of webcam conversations, I believe probable cause exists that Troy possessed and viewed CSAM on or around 08/22/2023.

9. Based on the information above, including the specific facts of probable cause and general background information related to these types of cases, I believe probable cause exists that further evidence will be located within or associated with the account(s) identified by "friedhawk7428" and "southpaw" in furtherance of the investigation of the crime of Sexual Exploitation of a Minor, as defined in Title 18, U.S. Code 2251. Based on the totality of this information, I believe that the Discord User IDs identified in **Attachment A** belong to Troy and yet to be identified user "southpaw" that evidence, instrumentalities, contraband, and/or fruits of violations further described in **Attachment B** will be located in their Discord accounts.

BACKGROUND INFORMATION ON DISCORD

1. Based on my training and experience, and review of publicly available information about Discord¹, Discord is a voice, video, and text chat application. Users can communicate in private, invite-only servers; in larger, more open communities; and in private one-on-one messages. Discord does not require names or addresses for individuals to create accounts, but an individual may provide a name or telephone number voluntarily. Discord does require an email address for users to create an account. If the user is a paid user, Discord may have billing information. Discord collects information about the device a user is using to access Discord services, which includes information such as a user's Internet Protocol (IP) address, operating system information, browser information and information about a user's device settings (e.g. camera/microphone). Discord collects logs and event information related to how and when a user uses Discord's services (such as the pages, servers and channels a user visits).

2. In my training and experience, providers like Discord typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e. session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account and other log files that reflect usage of the account. In addition, providers often have records of the IP address used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP

¹ <https://discord.com/safety/360044157931-working-with-law-enforcement#title-2> and <https://discord.com/privacy>

address information can help to identify which computers or other devices were used to access an account.

3. Discord retains personal information “for as long as it is needed for the purposes for which we collected it.”² Discord also retains content of messages exchanged between users. Discord accepts requests to preserve records from law enforcement. As stated previously, preservation requests were served by law enforcement to Discord for content of the suspected accounts belonging to Troy and “southpaw”.

4. In some cases, account users will communicate directly with a provider about issues relating to their account, such as technical problems, billing inquiries or complaints from other users. Providers typically retain records about such communications, including records of contacts between the user and the provider’s support services, as well as records of any actions taken by the provider or user because of the communications.

5. As explained herein, information stored in connection with messaging applications may provide crucial evidence of the “who, what, when, where and how” of the criminal conduct under investigation, thus enabling the United States to establish any prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, the information stored in connection with messaging applications can indicate who has used or controlled the account. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. For example, messaging communications, contact lists and images sent (and the date associated with the

² <https://discord.com/privacy>

foregoing, such as date and time) may indicate who used or controlled the account at a relevant time. Also, stored electronic data may provide relevant insight into the messaging account owner's state of mind as it relates to the offense under investigation. For example, information in a messaging account may indicate the owner's motive and intent to commit a crime (e.g. communications relating to the crime) or consciousness of guilt (e.g. deleting communications in an effort to conceal them from law enforcement).

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

6. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Discord to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of **Attachment B**. Upon receipt of the information described in Section I of **Attachment B**, government-authorized persons will review that information to locate the items described in Section II of **Attachment B**.

CONCLUSION

7. Based on the foregoing, I request that the Court issue the proposed search warrant.

8. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

9. The government will execute this warrant by serving the warrant on Discord. Because the warrant will be served on Discord, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

SAUSA Carl Hollan reviewed this Affidavit.

Respectfully submitted,

/s/ Jed Wright

Special Agent
Federal Bureau of Investigation

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 25th day of November, 2024, at 1:28 PM

Dated 12/3/2024



Cecilia M. Romero
Cecilia M. Romero
United States Magistrate Judge

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the accounts User ID: friedhawk7428@yahoo.com and User ID: southpaw and that is stored at premises owned, maintained, controlled, or operated by Discord, Inc., a company headquartered at 444 De Haro Street, Suite 200, San Francisco, California 94107. Preservation Requests were made to Discord for the aforementioned accounts and assigned Request Number : DISC-19555.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Discord, Inc.

To the extent that the information described in **Attachment A** is within the possession, custody, or control of Discord, Inc. (hereafter Discord), regardless of whether such information is located within or outside of the United States, and including any messages, records, files, logs, or information that have been deleted but are still available to Discord, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Discord is required to disclose to the government for each account or identifier listed in **Attachment A**, the following information from September 1, 2023 – present:

a. All records or other information regarding the identification of the accounts, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);

b. All device information associated with devices used to access the accounts, including but not limited to, manufacture names, model numbers, serial numbers, media access control (MAC) addresses, international mobile equipment identifier (IMEI) numbers, FCC ID numbers, Android IDs and telephone numbers;

c. The contents of all messages, including images and videos, sent from and received by the accounts, including sent messages, received messages, draft messages and deleted messages;

- d. Any geolocation information related to the accounts;
- e. A list of accounts associated with the accounts, including but not limited to buddy lists, contact lists, followers and accounts being followed by the accounts;
- f. A list of all servers the accounts were participants in;
- g. All records or other information stored by an individual using the accounts, including address books, contact and buddy lists, photos, videos and other files;
- h. All records pertaining to communications between Discord and any person regarding the accounts, including contacts with support services and records of actions taken.

Discord is hereby ordered to disclose the above information to the government within **14** days of issuance of this warrant.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of Title 18 U.S.C. § 2251(a) (Sexual Exploitation of Children/Production of Child Pornography), Title 18 U.S.C. § 2252A(a)(2) (Receipt of Child Pornography) and Title 18 U.S.C. § 2422(b) (Enticement of a Minor) that have been committed by TROY SULLENBERGER between January 1, 2023 – present, including, for each account or identifier listed on **Attachment A**, information pertaining to the following matters:

- (a) Any and all communications between the account, to include images and videos, transferred between the accounts, between approximately January 2023 – present;
- (b) Any images or videos consistent with child pornography, as defined in 18 U.S.C. § 2256(8), or child erotica;
- (c) Any communications related to the statutory violations listed above and involving CV and/or other child victims yet to be identified;

- (d) Any communications related to the travel away from North Carolina to Missouri and other intended locations;
- (e) Evidence of the location of the users of the accounts when the accounts were in communication with each other;
- (f) The identity of the person(s) who created or used the accounts, including records that help reveal the whereabouts of such person(s);
- (g) The identity of the person(s) who communicated with the account about matters relating to the statutory violations listed above, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC
RECORDS PURSUANT TO FEDERAL RULES OF
EVIDENCE 902(11) AND 902(13)**

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by Discord, Inc., and my title is _____.

I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Discord, Inc. The attached records consist of _____ (pages/CDs/megabytes)]. I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Discord, Inc., and they were made by Discord, Inc. as a regular practice; and

b. such records were generated by Discord, Inc.'s electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Discord, Inc. in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by Discord, Inc., and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.

Date

Signature